

Frasers Property Australia
Frasers Property Industrial
FLT Australia Trust



Joint Modern Slavery Statement FY2022





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Frasers Property acknowledges the Traditional Custodians of the land on which our business operates, and recognises their continuing connection to land, waters, and community. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present, and emerging.

ABOUT THIS STATEMENT

This Joint Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* for the period 1 October 2021 to 30 September 2022 (FY22). The Statement applies to the following reporting entities and any entities that they own or control (hereby referred to as 'Frasers Property' or 'we'/our'):

- Frasers Property Australia Pty Ltd ABN 89 600 448 726 (Frasers Property Australia)
- Frasers Property Industrial Australia Pty Limited ABN 22 107 356 454 (Frasers Property Industrial)
- Frasers Property Funds Management Limited as trustee of FLT Australia Trust ABN 73 542 867 051 (FLT Australia Trust)

The Statement outlines our structure, operations and supply chains, and the associated risk of modern slavery. It details the steps Frasers Property has taken to assess and address these risks, and how we evaluate the effectiveness of our actions.

Each reporting entity (and entities owned or controlled by the reporting entities) has been consulted in the preparation of this Statement through active engagement with relevant internal stakeholders as identified by Frasers Property's Sustainability Team. The consultation process involved the CEO, the Executive Management Team, and other key representatives from each of the reporting entities reviewing and endorsing this Statement.

This Statement has been approved by the Boards of Frasers Property Australia, Frasers Property Industrial and FLT Australia Trust.

Modern Slavery Act 2018 (Cth) reporting criteria

Criterion	Page Reference
Identify the reporting entity	4
Describe the structure, operations and supply chains of the reporting entity	8-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	12-14
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	15-23
Describe how the reporting entity assesses the effectiveness of such actions	22
Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a joint Modern Slavery Statement - the entity giving the statement	4
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	5-6, 12-13, 23-24

MESSAGE FROM THE CEOS

In March 2021, Frasers Property published its first Modern Slavery Statement. This milestone formalised our aim to combat the industry-wide issue of modern slavery through collaboration with our peers. This financial year, our Statement has been updated to ensure that our actions and our focus remain robust and appropriate for the future.

At Frasers Property, we work to respect, protect, improve, and promote the rights and wellbeing of everyone. We have zero tolerance to modern slavery, and we rally against human rights violations and the exploitation of people.

Our Modern Slavery Statement demands that we act. It guides how we can drive momentum within our organisation and in the communities in which we live and work, up and down supply chains we rely on and influence, and among our partners and peers.

Our approach focuses on identifying, preventing, mitigating, and remediating the risks of modern slavery, guided by the United Nations Guiding Principles on Business and Human Rights. Our company values - to be Respectful, Real, Collaborative and Progressive - are at the core of this approach.

We expect our team, our partners, our suppliers, and our contractors to meet these standards, as set out in our Statement and policies. We do not accept behaviours which breach the law or fail to comply with our corporate policies. Working collectively is how we will achieve our goals.

We must also be transparent in this work. Each financial year, we disclose our achievements through annual statements. We interrogate our policies and openly critique our performance.

Our commitment in this space is ongoing. In recent times, we have achieved real progress and made significant inroads in effectively combatting modern slavery. We will remain open in our effort to continually expand our knowledge, invest in resources, and grow our experience, to ensure that these achievements are built upon.



Anthony Boyd
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Australia Pty Ltd
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KEY HIGHLIGHTS

FY22 Achievements

Established a **pre-qualification process** that incorporates modern slavery.

75% of suppliers engaged in FY22 completed the Modern Slavery Supplier Assessment within the reporting period.

Completed an inherent risk assessment of **2,656** direct suppliers.

Delivered modern slavery training to **167** employees.

Drafted **contract clauses** relating to modern slavery.

FY23 Priorities

Update our **contract templates** to include the modern slavery clauses drafted in FY22.

Launch the **contractor management platform** and associated pre-qualification requirements for modern slavery to the business.

Develop and deliver specific **modern slavery training** to all relevant employees.

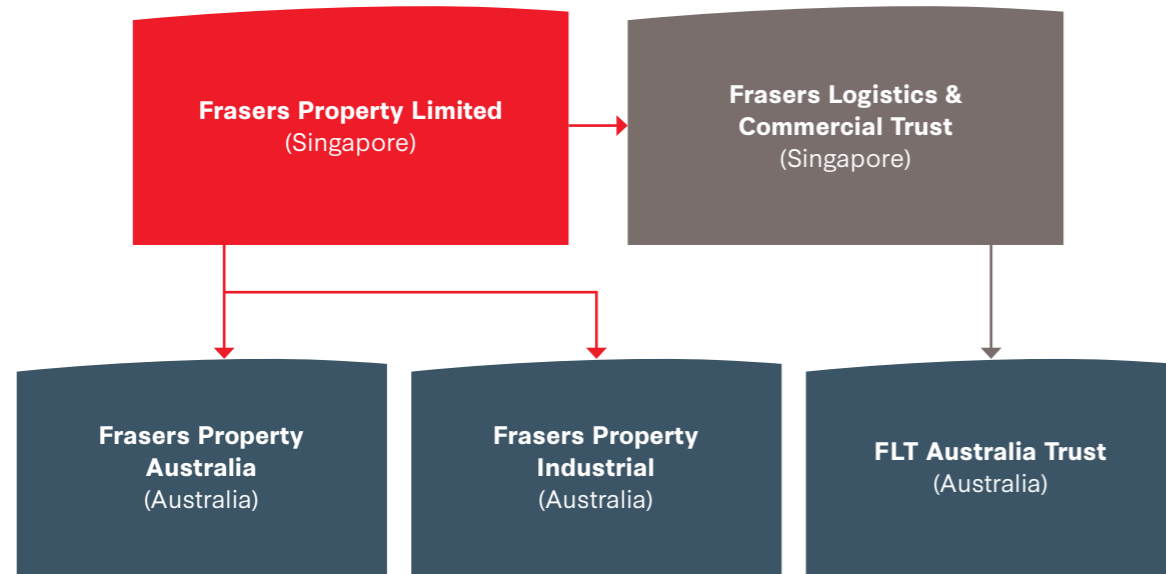
Review, and where necessary, update **policies and procedures** relating to modern slavery.



STRUCTURE & OPERATIONS

Frasers Property Australia, Frasers Property Industrial, and FLT Australia Trust are all subsidiaries of Frasers Property Limited (Group) – our parent company headquartered in Singapore. Frasers Property Limited is a multi-national company that develops, owns, and manages a diverse, integrated portfolio of properties. The Group is a signatory of the United Nations Global Compact and is listed on the Main Board of the Singapore Exchange Securities Trading Limited with a total asset value of S\$40.2 billion as at 30 September 2022. Assets include commercial and business parks, retail, industrial and logistics, residential, and hospitality predominantly located in Australia, China, Europe, the United Kingdom, Thailand, Singapore, and Vietnam.

Our business structure



Our operations include property development, asset management, property operations, and corporate operations, all of which are primarily located within the boundaries of Sydney, Melbourne, Brisbane, and Perth. We collectively employ 701 employees (as at 30 September 2022) across development, planning, design, construction, finance, sales and marketing, property and building management, customer service, and the corporate roles that service business operations.

Risk Management

Our Risk Management Policy sets out our approach to risk management, which includes a no-risk appetite for modern slavery in the production and / or supply chain. This Policy provides details of our risk governance framework, which identifies who in the business is involved in risk management and what their underlying responsibilities are. Risk management at Frasers Property starts with our Board, who are responsible for monitoring the effectiveness of risk management, internal control, and compliance processes, and ends with our employees and contractors, who are accountable for complying with our risk management policies and procedures.

STRUCTURE & OPERATIONS

Frasers Property Australia

Frasers Property Australia is one of Australia's leading diversified property groups. Its activities comprise of the development of residential land, housing and apartments, build-to-rent, commercial, retail, and mixed-use properties, as well as the ownership and management of investment property, incorporating property and asset management services. Frasers Property Australia provides asset and property management services to Frasers Logistics & Commercial Trust (FLCT), a Singapore-listed real estate investment trust, for commercial office properties in Australia. Frasers Property Australia also owns Real Utilities, a stand-alone business and licensed Australian carbon neutral energy retailer that installs and operates its own energy infrastructure.

Frasers Property Industrial

Frasers Property Industrial is a multi-national property owner, developer, and manager with a reputation as a market leader in the industrial, logistics and commercial property sectors. Business operations include integrated development, asset management and third-party capital management capabilities across industrial and logistics markets in Australia, Germany, the Netherlands, and Austria. Frasers Property Industrial also provides asset and property management services to FLCT for logistics and industrial properties in Australia, Germany, and the Netherlands.

FLT Australia Trust

FLT Australia Trust is a subsidiary of FLCT and is a Managed Investment Trust which holds all the Australian assets of FLCT.



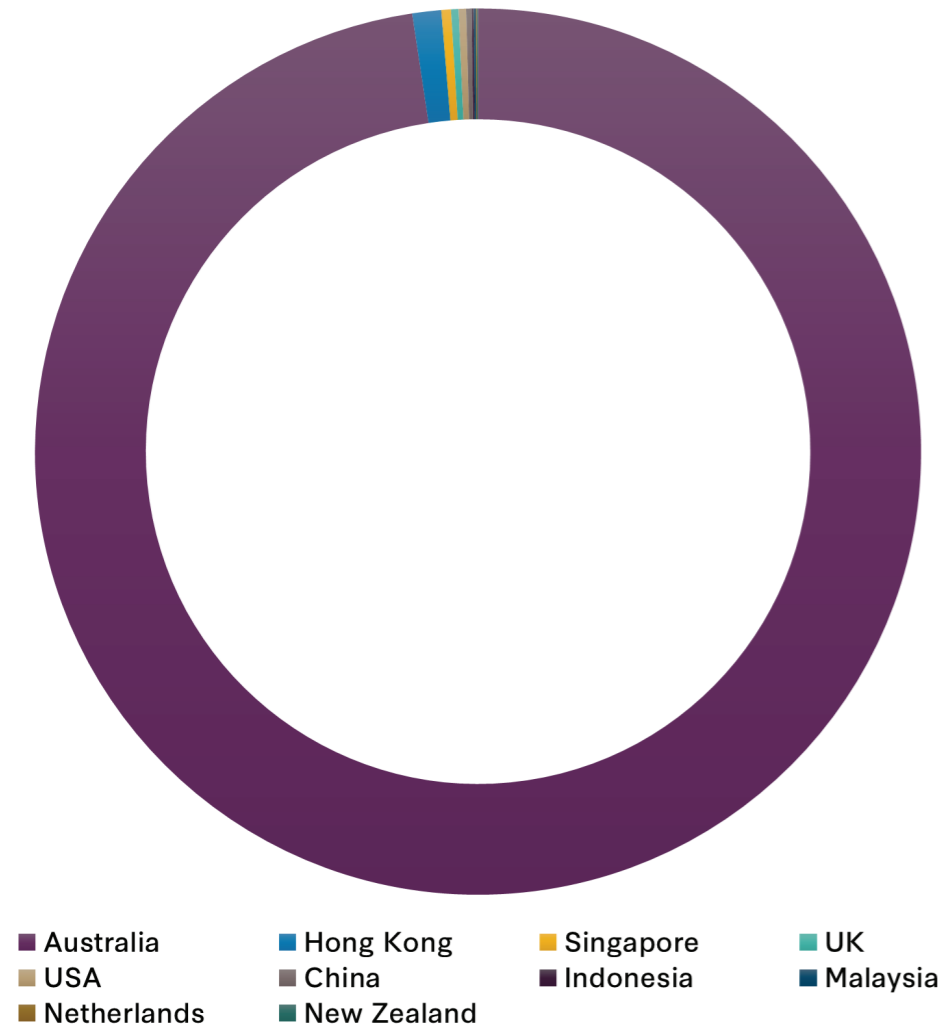
OUR SUPPLY CHAIN

As a property developer, owner, and manager of a diverse asset portfolio, Frasers Property directly procures a wide range of goods and services for asset development and operations, as well as corporate functions. We source these goods and services from a variety of carefully selected suppliers and business partners, ranging from multi-national organisations to small family-owned businesses. We also outsource some of our operational functions and delivery processes to third-party contractors who acquire goods and services on our behalf.

In FY22, we engaged with 2,567 direct suppliers (Tier 1), procuring around AUD\$2.7 billion in goods and services. The diagrams below provide a visual breakdown of our Tier 1 supply chain by sector (as defined by the [International Standard Industrial Classification](#)) and country of operation. At a glance, Figure 2 indicates that more than half of our direct suppliers operate within the professional, scientific, and technical activities and construction sectors. Meanwhile, Figure 1 shows that almost all of our direct suppliers operate within Australia, however, we are conscious that our Tier 1 suppliers have their own diverse and complex supply chains that can extend beyond the boundaries of Australia.

Our FY22 Supply Chain

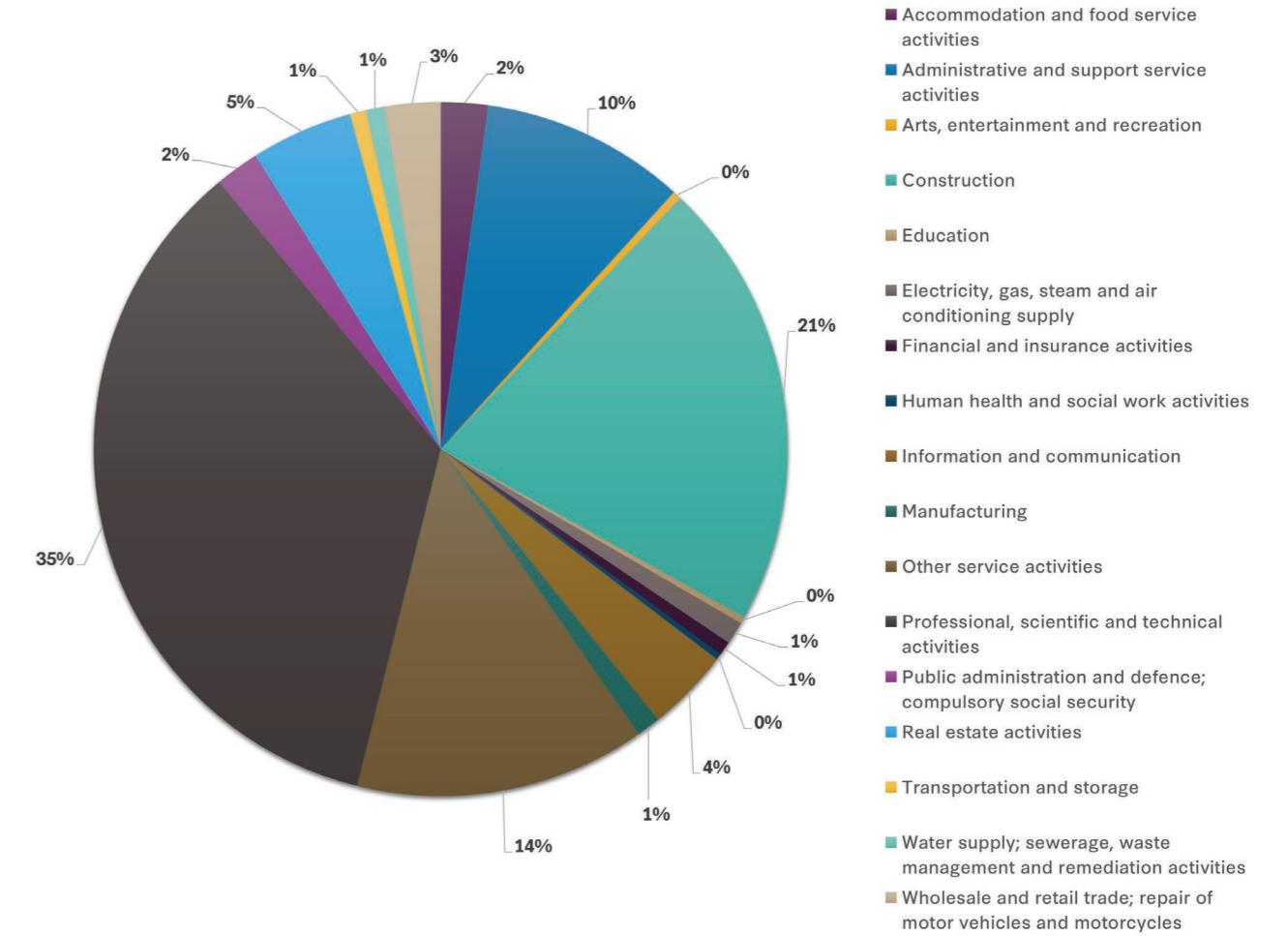
Figure 1 - Distribution of Tier 1 Supply Chain by Country of Operation



OUR SUPPLY CHAIN

Our FY22 Supply Chain

Figure 2 - Distribution of Tier 1 Supply Chain by Sector



MODERN SLAVERY RISKS

The Global Context

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The *Modern Slavery Act 2018 (Cth)* defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour¹.

In 2021, 49.6 million people were estimated to be living in modern slavery globally², increasing from 40.3 million in 2016³. This rise is largely attributed to the COVID-19 pandemic, armed conflicts, and climate change⁴. The property and construction industries are especially vulnerable to modern slavery due to the high demand for low-skilled labour, a lack of visibility of the complex and extensive supply chains, and the vast number of low-tier suppliers operating in high-risk locations⁵. Over 16% of victims in forced labour exploitation (2.8 million people) are in the construction industry, with many of these cases involving migrant workers being coerced through fraudulent recruitment practices⁶.

The Australian Context

While it is estimated that there were up to 1,900 people living in modern slavery in Australia between 2015 and 2017, 80% of victims go undetected⁷. In the Australian 2021-22 financial year, the Australian Federal Police received almost 300 reports relating to modern slavery – a 30% increase from the previous financial year⁸.

Most modern slavery cases in Australia involve migrants, as they are particularly susceptible due to the inherent vulnerabilities of low-skilled temporary migration⁹. This is likely to increase over time, not only in Australia, but globally, as the impacts of climate change and political conflict evolve.

The *Modern Slavery Act 2018 (Cth)* aims to address these issues by requiring specific entities with operations in Australia to report on the actions they are taking to mitigate and remediate modern slavery in their operations and supply chains.

1. <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>
2. <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm#:~:text=49.6%20million%20people%20were%20living,22%20million%20in%20forced%20marriage.>
3. https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf
4. <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>
5. <https://humanrights.gov.au/our-work/business-and-human-rights/publications/property-construction-and-modern-slavery-2020>
6. https://cdn.walkfree.org/content/uploads/2022/09/12142341/GEMS-2022_Report_EN_V8.pdf
7. https://modernslaveryregister.gov.au/resources/Modern_Slavery_infographic.pdf
8. <https://www.afp.gov.au/news-media/media-releases/reports-human-trafficking-and-slavery-afp-reach-new-high>
9. <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>

MODERN SLAVERY RISKS

Our Modern Slavery Risks

At Frasers Property, most of our workforce is employed directly through our People and Culture Team, which allows us direct oversight of the recruitment process and significantly lowers the risk of modern slavery within our operations. We do occasionally employ temporary staff via recruitment agencies for short-term engagements; however, these employees are vetted internally prior to engagement. To ensure that our employees are aware of their rights, all staff are provided with access to and training on our policies and procedures relating to employment, which are regularly reviewed and updated in line with current legislation and best practice.

The risk of modern slavery is significantly higher in our supply chain, particularly in situations where we outsource our operational functions and delivery processes, as we have less direct visibility and control over the procurement of materials and the employment of workers. Although most of our direct suppliers are Australian businesses, we are aware that their supply chains may extend outside Australian borders, which increases the risk of modern slavery in Tier 2 and beyond of our supply chain.

The services we procure that are particularly vulnerable to modern slavery include security, cleaning, waste management, and trade works, while the procurement of branded and unbranded goods, carpet, concrete, bathroom materials, timber and lumber, and windows have been identified as materials with a higher risk of modern slavery for our business. More recently, personal protective equipment (PPE) and solar panels have been flagged across the industry as products that have a higher risk of modern slavery at the manufacturing stage, and we may need to address risks associated with these products in greater detail.

As we further develop our understanding of and approach to reducing the risks of modern slavery, we will expand our scope beyond our direct suppliers and begin exploring the risks of modern slavery further down our supply chain.

Solar Energy Risks

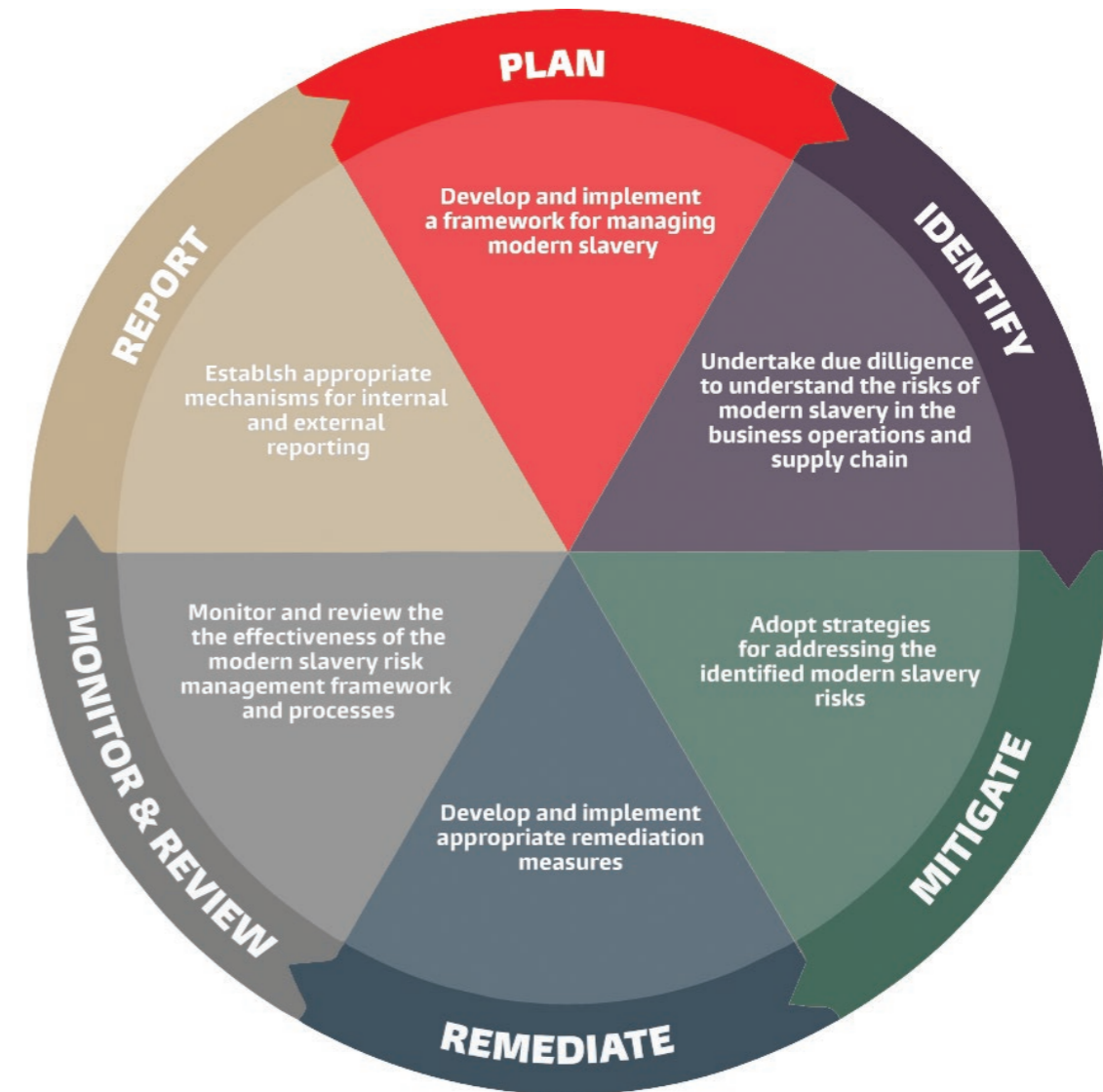
Frasers Property are aware of the significant modern slavery risks associated with the manufacturing of solar modules, particularly those produced in the Xinjiang Uyghur Autonomous Region. We have taken some important first steps to ensure that we are addressing these risks within our supply chains. In FY22, we reached out to our solar panel installers to complete the Modern Slavery Supplier Assessment and to action key initiatives to reduce the risk of modern slavery in their operations and supply chains. We have also mapped out our major solar panel providers, who will be required to complete the assessment in FY23. We will continue to work closely with internal stakeholders and industry experts to mitigate the risk of modern slavery in this industry.



MANAGING OUR RISKS

Our approach to managing modern slavery risks follows a robust methodology for identifying, mitigating, and remediating modern slavery risks, and assessing the effectiveness of these actions. This approach, which has been informed by our engagement with industry experts in 2018 and best practice management, is reflected below in our Modern Slavery Risk Management Framework.

Frasers Property's Modern Slavery Risk Management Framework



Plan

To support our approach to managing modern slavery risks at Frasers Property, we have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of employees and suppliers. These documents ensure that our employees and suppliers clearly understand our expectations, commitments, and processes.

In FY22, we revised and shared our Modern Slavery Risk Procedure with key stakeholders in the business and updated our HSE Risk Management Procedures to include provisions in relation to managing the risks of modern slavery. In FY23 we plan to review, and where necessary update, all policies and procedures relating to modern slavery to ensure that they remain effective and relevant to the needs of our employees and suppliers.

MANAGING OUR RISKS

Our policies and procedures as relevant to human rights and modern slavery

Policy or Procedure	Purpose
Anti-Bribery Policy	Sets out the policies and procedures that have been put in place to prevent the occurrence of bribery and corruption. Frasers Property has a zero-tolerance approach to bribery and corruption.
Code of Business Conduct	Provides clear guidelines on ethics and relationships, thereby safeguarding the reputation and interests of Frasers Property and our stakeholders and governing the conduct of every employee.
Corporate Social Responsibility Policy	Reflects our commitment to create places where resources are reused, recycled, and restored, and where new ideas are fostered to support people and the planet, and initiatives are taken to help people lead better, healthier lives.
Grievance & Dispute Resolution Policy	Stipulates how employees may raise and discuss work-related matters of concern with a view to resolving issues as quickly as possible.
Guide to Making a Disclosure	Explains how employees or officers of Frasers Property can make a report under the Whistle-blower Policy. This Guide should be read in conjunction with the Whistle-blower Policy.
HSE Incident Management	Defines the minimum requirements for responding, reporting, investigating, and managing Health, Safety and Environment (HSE) incidents.
HSE Risk Management	Defines the minimum requirements for the effective and consistent identification, assessment, control, and review of HSE hazards and risks.
Modern Slavery Risk Procedure	Sets out our approach to identifying and managing modern slavery risks in relation to our direct procurement of all goods and services.
Responsible Sourcing Policy	Communicates Frasers Property's commitment to procuring goods and services responsibly and our expectations of suppliers in this regard.
Risk Management Policy	Seeks to identify, assess, monitor, and manage risks across the organisation. Frasers Property will ensure that risk management is an integral part of our decision-making process and will use risk management to take advantage of potential opportunities while managing potential adverse effects.
Whistle-blower Policy	Details the framework for receiving, investigating, and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Frasers Property or current and former directors, officers, agents, employees, and contractors of Frasers Property.

MANAGING OUR RISKS

Identify

Risk Assessment

In 2016, as part of the sustainability commitments outlined in our A Different Way strategy, Frasers Property conducted an assessment and mapping exercise of our supply chain to better understand key risks and opportunities, and to identify how best to work with our suppliers to manage environmental and safety hazards.

In 2018, Frasers Property engaged an industry expert to undertake a risk assessment of our Tier 1 supply chain, establish a responsible sourcing commitment, integrate responsible sourcing considerations into our procurement processes, and increase awareness and capacity amongst key stakeholders, including employees and suppliers. The outcomes of the risk assessment had previously informed our supplier management process, which centred on categorising our direct suppliers into four levels of risk based on annual spend and vendor type.

Given the growth of technical expertise in the modern slavery space since we conducted this risk assessment, we elected to undertake a refresh of this process. In 2022, Frasers Property engaged an external consultant to conduct an inherent risk assessment of our direct suppliers. This involved drawing on a compilation of independent global data sources and a comprehensive risk assessment tool to assign a risk score to each of our suppliers based on their site location and activity. This risk score takes into consideration five risk categories relevant to modern slavery; children and young workers, discrimination, forced labour, regular employment, and working hours.

The results of this assessment provided the foundation for the development of a modern slavery risk matrix, which we use to determine which suppliers we engage with and the extent of engagement. The diagram below sets out our modern slavery risk matrix, which classifies our direct suppliers into very high-, high-, medium-, low-, and very low-risk categories based on their risk score and annual spend.

Frasers Property's modern slavery risk matrix

		Leverage by Annual Spend (AUD\$)					
		<\$30K	\$30K - \$50K	\$50K - \$100K	\$100K - \$500K	\$500K - \$1M	>\$1M
Risk Category	1						
	2						
	3						
	4						
	5						

Legend

	Very High Risk - Modern Slavery Supplier Assessment required
	High Risk - Modern Slavery Supplier Assessment required
	Medium Risk - Modern Slavery Supplier Assessment Lite required
	Low Risk - Modern Slavery Supplier Assessment not required
	Very Low Risk - Modern Slavery Supplier Assessment not required
	Excluded - Suppliers exempt from engagement

Risk Category Definition

1	Extreme or high risk score identified across any risk category
2	Medium risk score identified across all risk categories
3	Medium risk score identified in 3 or 4 risk categories
4	Medium risk score identified in 1 or 2 risk categories
5	Low risk score identified across all risk categories

Risk Score Scope

Extreme risk score	8.0 - 10.0
High risk score	6.0 - 7.9
Medium risk score	4.0 - 5.9
Low risk score	0.0 - 3.9

Managing Our Risks

Modern Slavery Supplier Assessment

In FY20, Frasers Property, as a member of the Property Council of Australia's (PCA) Modern Slavery Working Group, collaborated with industry peers and experts to develop a Modern Slavery Supplier Assessment. The assessment provides a mechanism for businesses to engage with their suppliers to identify and assess the risks of modern slavery within their operations and supply chains. It consists of up to 57 questions that require a response and, in some cases, supporting evidence. Through collaboration with the PCA Modern Slavery Working Group and Frasers Property's internal risk team, we identified 18 of the 57 questions as high-risk indicators of modern slavery and determined our preferred and non-preferred responses to these questions. The list of high-risk questions and their associated preferred and non-preferred responses can be found in the appendix.

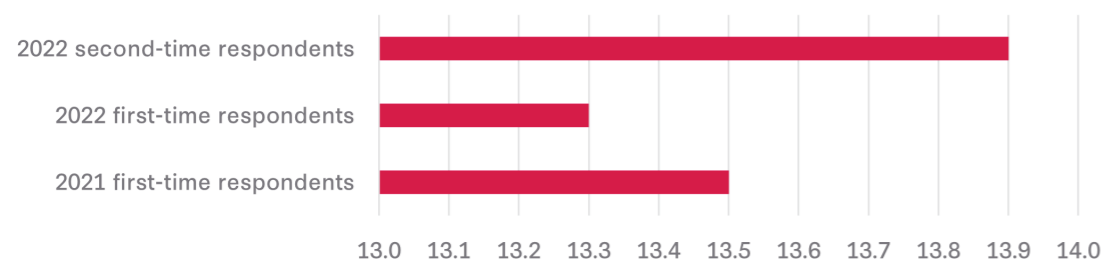
In 2022, we engaged with almost all of our contracted Australian-based high-risk and very high-risk suppliers as identified in our risk matrix. Of the 91 suppliers that were engaged, more than half operate in the construction sector, while almost a third work in administrative and support service activities. 75% of engaged suppliers completed the Modern Slavery Supplier Assessment within the reporting period, with another 20% submitting the assessment after the financial year deadline. We are continuing to work with the remaining five suppliers to close out their Modern Slavery Supplier Assessment for 2022. The infographics below summarise the responses to the 18 high-risk questions from suppliers who completed the assessment at the request of Frasers Property for either the first time in 2021, the first time in 2022, or the second time in 2022.

Modern Slavery Supplier Assessment response summary

Year-on-year improvements in addressing modern slavery risks

33% of our suppliers who completed the assessment in 2021, improved the number of preferred responses to high-risk questions in their 2022 assessment, suggesting that meaningful action is being taken to reduce the risk of modern slavery in our suppliers' operations and supply chains.

Figure 3 - Average Number of Preferred Responses to High-Risk Questions

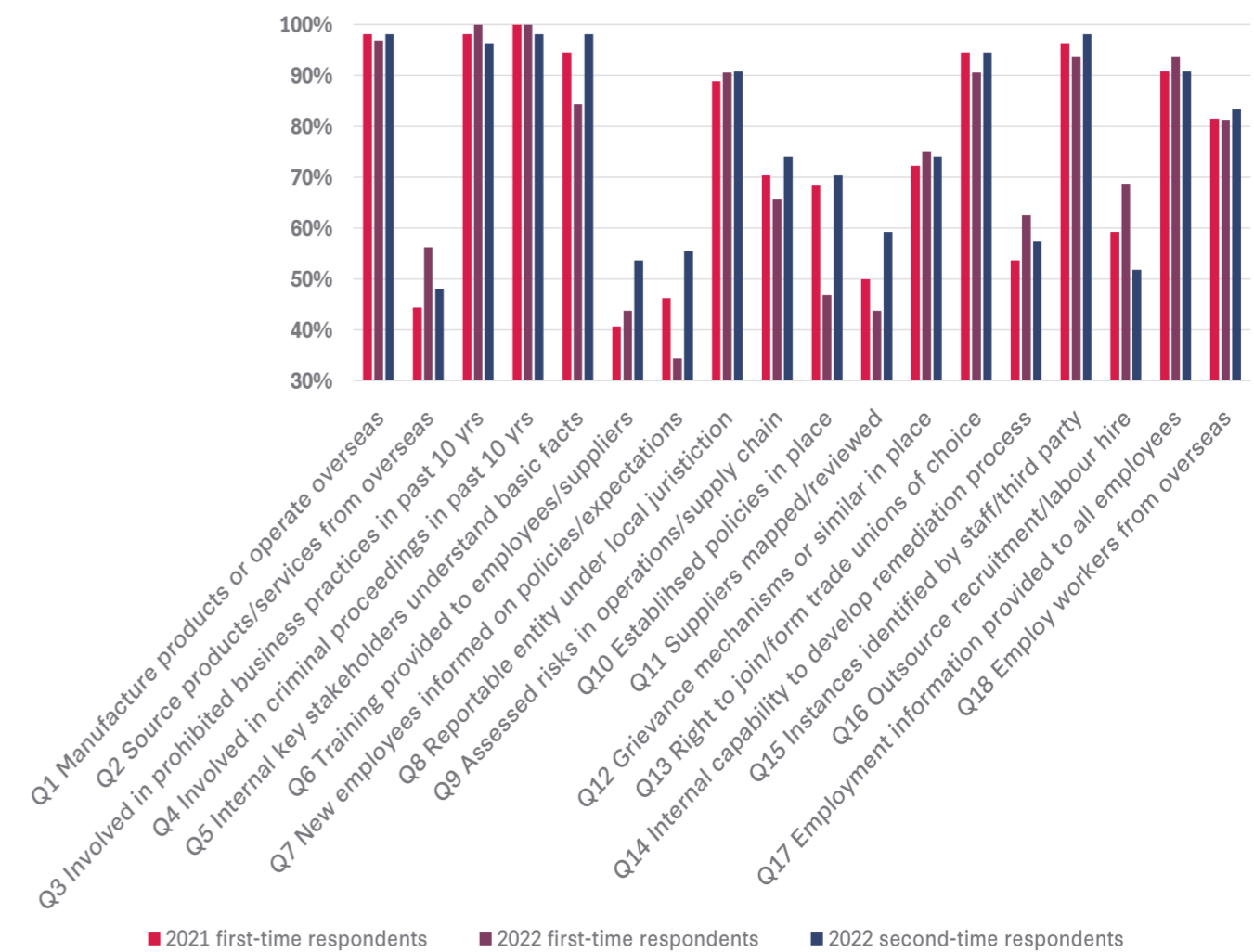


Managing Our Risks

A growing awareness of modern slavery in our supplier's workforce

We saw a 13% and 10% rise in preferred responses to question six and seven respectively from suppliers who completed the assessment in 2022 for the second time. This indicates that an increasing number of our suppliers are beginning to educate their employees on modern slavery and how it relates to their business. However, preferred responses to these questions were low among suppliers who completed the assessment for the first time in 2022, suggesting that support in this space is still required.

Figure 5 - Percentage of Preferred Responses per High-Risk Question



The need to support suppliers in understanding their supply chains

While there was a 9% increase in the number of preferred responses to question 11 from suppliers who completed the assessment in 2022 for the second time, this question received one of the lowest numbers of preferred responses among suppliers who had completed the assessment for the first time in 2022. This highlights the need to support these businesses in understanding, mapping, and reviewing their supply chains.

MANAGING OUR RISKS

Mitigate

Corrective Action Plans

To mitigate the risks identified in the Modern Slavery Supplier Assessment, Frasers Property put together a Corrective Action Plan to assist suppliers in addressing modern slavery risks in their operations and supply chains. If a supplier provided a non-preferred response to any of the high-risk questions, they were issued with a Corrective Action Plan that specified the recommended actions for each high-risk response. Of the 86 suppliers who completed the assessment in 2022, 81 of them received a Corrective Action Plan. The actions detailed in the Plans included recommended tools and resources to be implemented to reduce the risks of modern slavery and/or a request for further evidence to support assessment responses.

Implementation Plans

To ensure action is taken, Frasers Property requested all suppliers that had completed the assessment and received a Corrective Action Plan to provide us with an Implementation Plan by 1 December 2022. This Implementation Plan needed to describe the steps that have been taken and/or will be taken over the 12 months following the completion of the assessment to mitigate the areas of high risk identified in the Corrective Action Plan. We received Implementation Plans from more than half of our suppliers, and we are continuing to support the remaining suppliers with the development of their Implementation Plans. Progress towards reducing the identified high risks will be re-assessed during the next annual Modern Slavery Supplier Assessment in 2023.

Our aim is to build capacity within our supply chain to reduce the risk of modern slavery, particularly in the areas flagged as high risk in the assessment. While we do not enforce the implementation of specific actions, we do expect, at a minimum, that our suppliers engage with us to work towards reducing their risks. If it is evident that no progress is being made, through both a lack of engagement with Frasers Property and a lack of improvement in the Modern Slavery Supplier Assessment, Frasers Property will reconsider its engagement with suppliers that do not operate in accordance with our values.

Contract Clauses

To ensure our suppliers engage with us on assessing and addressing the risks of modern slavery within our supply chains, Frasers Property has drafted contract clauses that specify our requirements relating to modern slavery. These clauses specify how we define modern slavery, the warranties that are to be provided by the contractor, and the actions to be taken in relation to contractor assessments. Having been drafted in FY22, these contract clauses will be included in Frasers Property precedent contracts from FY23 onwards.

Contractor Pre-Qualification

In FY22, Frasers Property also commenced engagement with a reputable software company to provide the business with a contractor management platform that allows us to assess and manage the compliance and risks of our suppliers. As part of this work, we established a pre-qualification process that ensures all of our existing and future contractors are compliant with relevant legislation and commit to abiding by our company policies. Once this is launched in the business in FY23, all contracted and tendering vendors will be required to read and acknowledge our Responsible Sourcing Policy and supply evidence that they have either published a Modern Slavery Statement in accordance with the *Modern Slavery Act 2018 (Cth)*, or that they are not required to do so as per the reporting thresholds.

MANAGING OUR RISKS

Modern Slavery Training

We believe that all employees at Frasers Property should have a basic understanding of modern slavery, regardless of their role or position within the business. That is why in FY22 we rolled out a 'Lunch & Learn' training session on modern slavery to Frasers Property employees. This 1-hour interactive session, presented by Robin Mellon, the CEO of Better Sydney and an expert on property, supply chains and sustainability in the built environment, focused on raising awareness of modern slavery by discussing what modern slavery is, why it is relevant to the business, who the victims are, what Frasers Property is doing to address it, what employees can do to make a difference, and how they can find out more about it.

In FY23, we will continue to raise awareness of modern slavery through events and communication material. Additionally, we will roll out specific briefing sessions to key stakeholders within the business who directly engage with our supply chain. The purpose of these sessions will be to inform relevant employees on our processes and procedures relating to modern slavery to support the implementation of our Modern Slavery Risk Management Framework.

Remediate

Frasers Property is committed to the highest standards of conduct and ethical behaviour in all its business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance.

We have in place several mechanisms for employees and third parties to make complaints or to report suspected or actual illegal activity or breaches. This includes our Whistle-blower Policy, Guide to Making a Disclosure, and Grievance & Dispute Resolution Policy.

The Whistle-blower Policy and associated Guide to Making a Disclosure details our framework for receiving, investigating, and addressing allegations of criminal, dishonest or unethical behaviour where that behaviour concerns the activities of Frasers Property or current and former directors, officers, agents, employees, and contractors. The documents are publicly available on our website for any whistle-blower to make a report through several available channels, including our Independent Whistle-blower Hotline. Each whistle-blower disclosure received is investigated and reported to the respective Executive Management Team.

Our Grievance & Dispute Resolution Policy stipulates how employees may raise and discuss work-related matters of concern with a view to resolving issues as quickly as possible. Employees must first raise their grievance with their immediate manager or supervisor, who will investigate the grievance on an impartial basis and agree an appropriate course of action with the employee to remedy the situation. All grievances are dealt with in strict confidence and can be escalated to the appropriate level of authority if the issue remains unresolved. Frasers Property's external grievance procedure also aims to ensure all grievances are managed in a systematic, fair, timely and transparent manner.

MANAGING OUR RISKS

Monitor & Review

We endeavour to continuously improve our approach to managing our modern slavery risks and to embed lessons learnt into our existing processes. As is essential for continuous growth and learning, Frasers Property has established a suite of mechanisms to assess the effectiveness of the actions that have been implemented to-date under the Modern Slavery Risk Management Framework. We are assessing effectiveness in relation to suppliers engaged in FY22, which includes all suppliers identified through our risk matrix. In FY23, we will expand these assessment mechanisms to cover actions that we plan to implement during the financial year.

Mechanisms to assess effectiveness

Action	Assessment Mechanism	Effectiveness
Policies and Procedures	Complete a third-party review and update of our existing policies and procedures to ensure they remain relevant and effective.	Completed in 2018 – to take place again in FY23
Risk Assessment	Update our risk assessment annually to ensure our understanding of our supply chain risks is current.	Completed in FY22 – to take place again in FY23
Modern Slavery Supplier Assessment	Track the percentage of engaged suppliers who have completed the Modern Slavery Supplier Assessment (MSA) to confirm engagement with our supply chain.	75% completion rate of MSA in FY22
Corrective Action Plan and Implementation Plan	Record the percentage of engaged suppliers who have reduced the number of non-preferred responses to high-risk questions in their MSA by at least one, compared to the previous year's MSA responses, to confirm action is being taken.	33% reduction rate in non-preferred responses in FY22
Contract Clauses	Review and update our modern slavery contract clauses periodically to ensure they remain relevant and effective.	Contract clauses to be included in contract templates in FY23.
Contractor Pre-qualification	Track the number of contractors flagged as high risk to guarantee contractor compliance.	Pre-qualification procedure to be launched to the business in FY23.
Modern Slavery Training	Record and compare year-on-year the percentage of training attendance to ensure awareness of modern slavery is increasing across the business.	No training held in FY21 24% attendance rate in FY22 attendance to be tracked in FY23
Effectiveness Assessment	Review and update our assessment mechanisms annually to ensure appropriateness of existing mechanisms and to incorporate additional mechanisms for actions planned in the upcoming financial year.	Completed for FY22 – review to take place again in FY23
Modern Slavery Statement	Complete a third-party review of our annual Statement to confirm compliance.	Completed for FY22 Statement – review to take place again in FY23

Additionally, in November 2021, we participated in a Modern Slavery Statements Feedback Session organised by the Property Council of Australia, during which subject matter experts analysed the most recent Modern Slavery Statements of fifteen leading participant organisations from across the property and construction sectors.

The feedback session included insights into patterns and trends, strengths and weaknesses, and opportunities and threats across the industry. This assisted us in understanding the effectiveness of the actions being taken to assess and address the risks in our operations and supply chains, improving our reporting processes, and increasing collaboration and consultation across the sector.

MANAGING OUR RISKS

Report

Since March 2021, Fraser Property has published a Modern Slavery Statement annually as required by the *Modern Slavery Act 2018 (Cth)*, which entered into force on 1 January 2019. This Act requires that all Australian and foreign entities operating businesses in Australia with at least AUD\$100 million annual consolidated revenue must prepare an annual Modern Slavery Statement covering their financial year.

The current requirements of the Act not only ensure that businesses are aware of their modern slavery risks but are also making a conscious effort to address them; ultimately holding companies accountable for their actions and inactions. Given the rigour of the reporting criteria, the annual Modern Slavery Statement is the mechanism we have adopted to report internally and externally on our progress and planned actions towards addressing modern slavery in our operations and supply chains.

In March 2022, the Australian Government announced that it will be conducting an independent statutory review of the Act led by Professor John McMillan and supported by the Australian Border Force and the Attorney-General's Department. As part of this review, the Government released an Issues Paper for public consultation in August 2022. The process focuses on evaluating the current operation of and compliance with the Act, and how this can be improved where necessary. Frasers Property has provided feedback on the Issues Paper through the PCA Modern Slavery Working Group.

NEXT STEPS

Frasers Property has made some important first steps toward addressing modern slavery risks in our operations and supply chains, and we are proud of the progress we have made to-date. However, we are conscious that there is still far more work to be done, and although modern slavery is not an issue that can be solved immediately, there are several actions that we have identified as priorities for the 2022 financial year.

FY23 Priorities

Action	Description
Modern Slavery Policy and Procedure Review	Review, and where necessary, update policies and procedures relating to modern slavery.
Risk Assessment	Complete a refresh of the modern slavery inherent risk assessment of our direct suppliers.
Modern Slavery Supplier Assessment Completion	Request all high and very high-risk suppliers to complete the Modern Slavery Supplier Assessment for FY23.
Corrective Action Plan Distribution	Distribute Corrective Action Plans to all suppliers who complete the Modern Slavery Supplier Assessment in FY23.
Implementation Plan Collection	Receive Implementation Plans from all suppliers who completed the Modern Slavery Supplier Assessment in FY22.
Contract Clauses	Update our contract templates to include the modern slavery clauses drafted in FY22.
Contractor Pre-qualification	Launch our contractor management platform and the associated pre-qualification requirements for modern slavery to the business.
Modern Slavery Training	Develop and deliver specific modern slavery training to all relevant Frasers Property employees to communicate the implementation of the above actions.
Internal and External Collaboration	Continue to collaborate with Frasers Property stakeholders, the PCA Modern Slavery Working Group, and other industry experts to share learnings and build capabilities.

APPENDIX

High risk assessment questions and associated non-preferred responses

Number	Question	Non-preferred Response
1	Does your organisation manufacture products overseas or maintain operations overseas that contribute to the delivery of your products or services?	Yes
2	Does your organisation source (via your supply chain) manufactured products or services from overseas that contribute to the delivery of your products or services?	Yes
3	In the last 10 years has your organisation been involved in any incidents, proceedings or does it have a record relating to bribery, corruption, fraud, money-laundering or other prohibited business practices?	Yes
4	Is your organisation currently involved in criminal proceedings or has it been involved in criminal proceedings during the last 10 years?	Yes
5	Do key stakeholders within your organisation understand the basic facts around the issue of 'Modern Slavery', with a general awareness of where modern slavery may exist in your Australian and/or international supply chains?	Not yet; or Not sure
6	Does your organisation provide any training to current employees or suppliers around the topic of human rights and modern slavery?	No; or No, but we plan to do so within the next 12 months
7	Are all new employees provided information and training on your organisation's human rights policies or expectations around modern slavery?	No; or No, but we plan to do so within the next 12 months
8	Is your organisation a reportable entity under either the Commonwealth or NSW Modern Slavery legislation or that of another jurisdiction?	We have not yet prepared a statement, but we plan to do so within the next 12 months; or No, we are not required to report on modern slavery
9	Has your organisation assessed the risks relating to modern slavery in its operations and supply chains?	No, we have not assessed the modern slavery risk in our operation and supply chain; or No, but we plan to do so within the next 12 months; or Other

APPENDIX

Number	Question	Non-preferred Response
10	Do you have established policies in place that cover the following issues: Human rights or modern slavery	No; or Under development
11	Thinking about your suppliers, how well does your organisation know its supply chains and have you taken any steps to map or review your suppliers?	We haven't done anything yet; or We have not mapped our supply chains, but we plan to do so within the next 12 months
12	Does your organisation have a grievance mechanism or process in place that provides an opportunity for employees, suppliers and the 'voice of the worker' to be heard?	No, we do not have plans to develop a formal grievance mechanism in the future; or No, but we are developing one within the next 12 months for i) employees ii) suppliers; or Other
13	Do employees of your organisation have the right to join or form trade unions of their own choosing, and to bargain collectively, without prior authorisation from your management according to national law?	No
14	Does your organisation have sufficient internal resources and capabilities to develop a remediation process, or implement a process for remediation once established, in the event that a human rights incident or modern slavery is discovered in your supply chain or operations?	No, we do not currently have sufficient resources and capabilities; or No, but we plan to establish sufficient resources within the next 12 months
15	Has your organisation ever been identified by your own staff or a third party as having instances of modern slavery in your operations or supply chains?	Yes; or Not sure
16	Does your organisation outsource some of or all your recruitment and labour hire, or do you conduct all your recruiting directly?	Our workers pay fees to agents to gain employment; and/or We have a long chain of labour recruiters; and/or We recruit through an agency or labour provider; and/or Other
17	Does your organisation provide every worker at all sites and facilities with written and understandable information about their employment conditions, including wages, hours, and holidays, before they enter into employment?	No; or No, but we plan to do so within the next 12 months
18	Does your organisation or your labour hire provider recruit any employees or workers from overseas, such as temporary or casual migrant workers?	Yes; or Not sure



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Cover Image:
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